

REMARKS

By the above, no claims have been amended. Reconsideration of the present application is respectfully requested.

In the Office Action, it is contended that Fujisawa teaches to tilt the wafer for correcting distortion. In this respect, the Office Action refers to passages of Fujisawa. The Applicants submit, however, that none of these passages relate to distortion. The term "distortion" occurs frequently in Fujisawa, but only in connection with the distortion of a retical shape (for example para. 95). In this context, the term "distortion" does not denote an aberration, but a mechanical deformation which may in itself cause various aberrations.

The Applicants note that the only exception is paragraph 66, in which the term "distortion" indeed denotes an aberration. However, in this paragraph, it is only described that distortion and other aberrations can be corrected by finally driving lens elements in the optical axis direction and by tilting such lens elements using driving elements (e.g. piezo electric elements).

In Fujisawa, the drive voltage (drive amount) to each driving element is controlled by a lens control unit 113. In contrast, the wafer recited in limitation d) (e.g., pending claim 1) is not a lens element, and the Applicant's respectfully submit that there is no motivation or teaching in Fujisawa not to tilt a lens element, but instead tilt the wafer as claimed.

Fujisawa is not concerned with correcting distortion or any other aberration by tilting the wafer. Instead, it is concerned about aberrations produced by a curved wafer (see Figs. 3A-3C). Conventionally, a curved wafer is tilted such that the average distance of its surface from the image plane of the projection objective is reduced, as is indicated in Figs. 3B-3C. Fujisawa teaches not only to tilt the wafer (see Fig. 4A), but also to correct a residual curvature-of-field

(see Fig. 4B) by driving and tilting the lens elements in the objective controlled by the lens control unit 113. Fig. 4B shows in its lower portion the remaining amount of curvature-of-field (see para. 85).

It is therefore believed that Fujisawa neither teaches nor motivates a person skilled in the art to tilt the wafer for correcting a distortion, and in particular not the very specific distortion recited in limitation b) of claim 1, for example. Accordingly, the Applicants respectfully submit that the present application is in condition for allowance and thus request notice of same.

Should anything further be required, a telephone call to the undersigned at (312) 226-1818 is respectfully solicited.

Respectfully submitted,

FACTOR & LAKE, LTD.

A handwritten signature in dark ink, appearing to read 'E. Bishop', written over a horizontal line.

Edward L. Bishop
One of Applicants' Attorneys

Dated: June 25, 2007